Dear Troup/Heard/Harris County, GA Resident:

We are an exciting new Internet access company called Gilat-to-Home (G2H). The company founders include Microsoft, EchoStar (owner of the DISH TV service), and Gilat Satellite Networks, a leading global satellite service provider. The G2H product will be available to the general public to deliver two-way broadband Internet access via satellite beginning later this year.

Currently G2H is conducting an aggressive pilot program (called the "Voyager Pilot"), and wishes to make a special offer to residents in the area around La Grange, GA *now – prior* to the public release of the service later this year. This offer provides the unique opportunity to explore an exciting broadband service from now through the holidays, without paying for equipment or monthly service charges. In mid-January 2001 we will offer you the best deal we have at that time for continuing service which you can accept at that time or decline with no penalty. The first 3,000 pilot participants will be eligible for the following service offer:

Two-way satellite based Internet connection with the following key features:

- ✓ A satellite antenna system including a 24"x36" dish, a new Dell PC (Celeron 500 MHz), and TV cabling
- ✓ An "always on" high-speed Internet connection via satellite
- ✓ Unlimited Internet access – no usage limitations. And, since G2H both receives and transmits over the satellite, you won't tie up your phone (or you can get rid of that second phone line!)
- ✓ 24/7 customer support

As a participant in the pilot, you are eligible for the following offer:

- Free broadband Internet service through 15 January 2001 – no monthly fees
- Free DISH network receiver (but you are responsible for programming service fees)
- Installation of the complete Internet and DISH service for $199 ($99 if you sign up by ~~18~~ 31 Aug 2000)

In return for making this low-cost offer, you will be required to participate in surveys to provide feedback on your satisfaction level and ideas for improving the service going forward. Since this is a trial program, there may be some down-times which will be used to upgrade the system in responding to your feedback and test results.

If you are interested in participating in this offer, **please review and complete the application documents**, which can be found at the following locations:

- The Gilat-To-Home application web site at **https://signup.gilat2home.com/voyager** (After reading the details of the offer and click on "I Accept", you will be prompted for a User I.D. and for a Password. *Please note that the User I.D. is*: **voyager** - and that *the Password is*: **vplt**)
- Troup County Chamber of Commerce
- West Georgia Technical College Business and Technology Center
- 7x24 Information line at 800-252-5763 (copies will be e-mailed, faxed, or mailed to you)

Additional information on the Gilat-To-Home company and service can be found at www.gilat2home.com. The local contact for information is Ed Eldredge of Four Winds / Tech Industry Consulting at 706-882-7999. Thank you for considering this offer. I hope to hear from you soon.

Sincerely yours,

K G Palmer

Grant Palmer
General Manager, Atlanta Group
Gilat-to-Home Inc.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In The Matter of Inquiry Concerning High-Speed Access to the Internet Over Cable and Other Facilities	GN Docket No. 00-185

To: The Commission

DECLARATION OF DAVID SEIBOLD

I, David Seibold, declare as follows:

1. I am the Regional Director of Advanced Services for Charter Communications, Inc., Southeast Region. I have been managing the Cable Internet services for South Carolina and North Carolina since February, 1998. As part of my duties, I am familiar with the marketing and relative market positions of Charter's cable modem service, and competing Internet access technologies, such as DSL and wireless.

2. Charter has been offering cable modem service in all of its Greenville/Spartanburg South Carolina franchise areas since January, 1999, and in some parts of the Greenville/Spartanburg area since as early as April 1998. Charter presently provides cable modem service to 6.5% of the homes that it passes in the Greenville/Spartanburg area.

3. Very quickly after Charter introduced cable modem service in the Greenville/Spartanburg area, the incumbent local exchange carrier, BellSouth, launched its DSL services to residents.

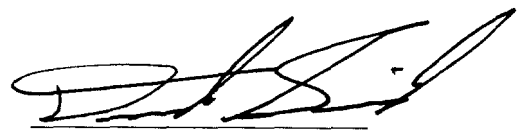
4. Over the past 18 months, BellSouth has been aggressively upgrading its facilities in Greenville/Spartanburg in order to enable the provision of DSL.

5. In addition, BellSouth is aggressively marketing its DSL offerings. It is using color, large-format direct mailings, billing inserts, broadcast television, and Internet Banner ads / DSL Reports page sponsorships to advertise its DSL service. In addition, BellSouth is offering a special where customers get 2 months for the price of 1, a free DSL modem, free activation and no installation fee. BellSouth's television and radio ads appear frequently.

6. Attached to this Declaration are copies of two advertisements for BellSouth's DSL service that I received at my home on November 1, 2000 and November 15, 2000. Both of the advertisements refer directly to cable modem service. My home is approximately 33,000 feet from the nearest BellSouth central office.

7. In addition to BellSouth, in the Greenville/Spartanburg area Charter faces competition from numerous other DSL providers, including Telocity, Northpoint, and Trivergent, that are operating using resold capacity from BellSouth. Telocity, Northpoint, Trivergent, and others are regularly advertising their services on local radio stations, on television, and in the newspapers.

I swear that the foregoing is true and correct to the best of my knowledge.



David Seibold

November 30, 2000

ATTACHMENT 1

BellSouth FastAccess Internet Service

Why can't the Internet?

Life and Business move @ RealTime.

BELLSOUTH
P.O. Box 55288
Atlanta, GA 30308-5288

PRSRT STD
U.S. POSTAGE
PAID
BELLSOUTH

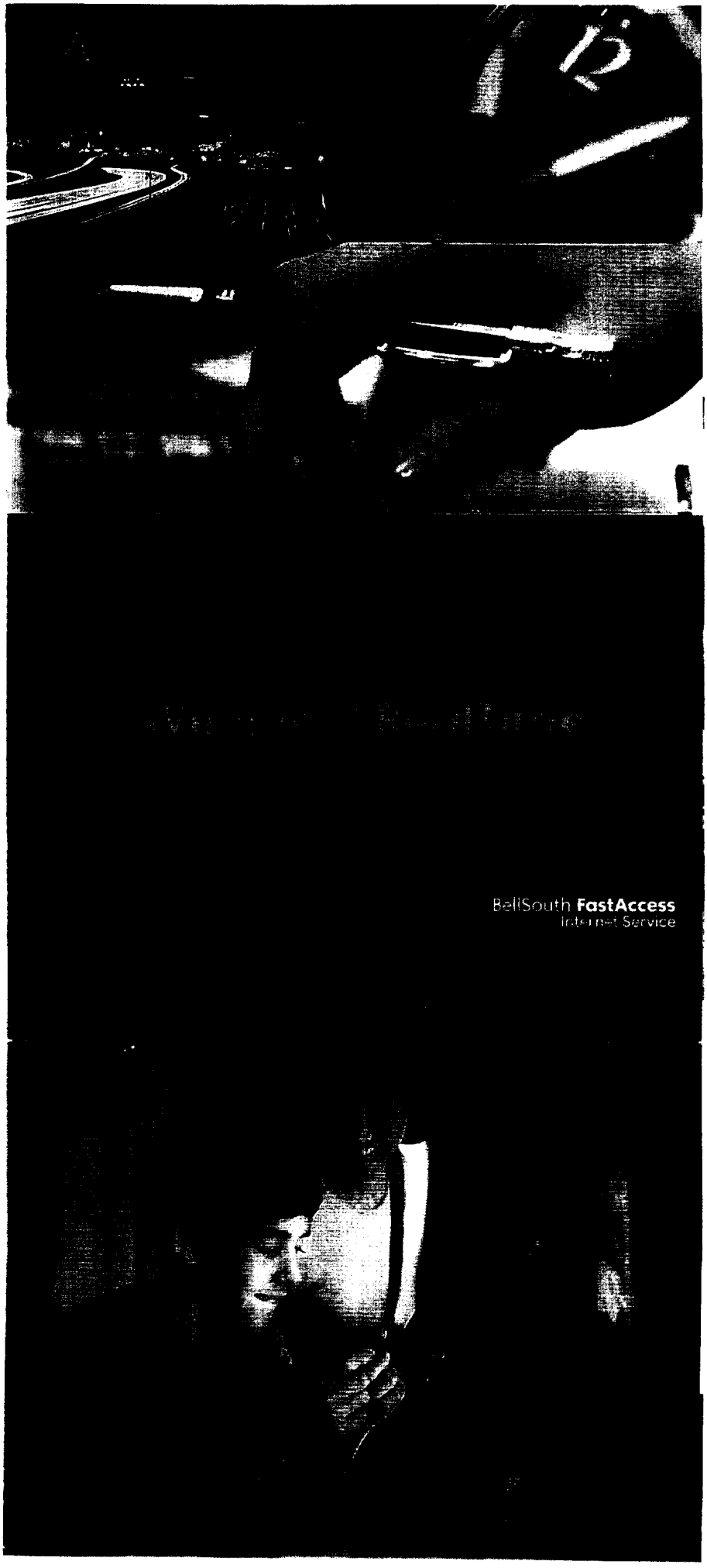
Order now and get 2 months for the price of 1 and a FREE DSL modem**

6 months of BellSouth® Internet Service

*******AUTO**5-DIGIT 29681
David Seibold
[redacted]

We work @ RealTime.

[redacted]


BellSouth FastAccess
Internet Service

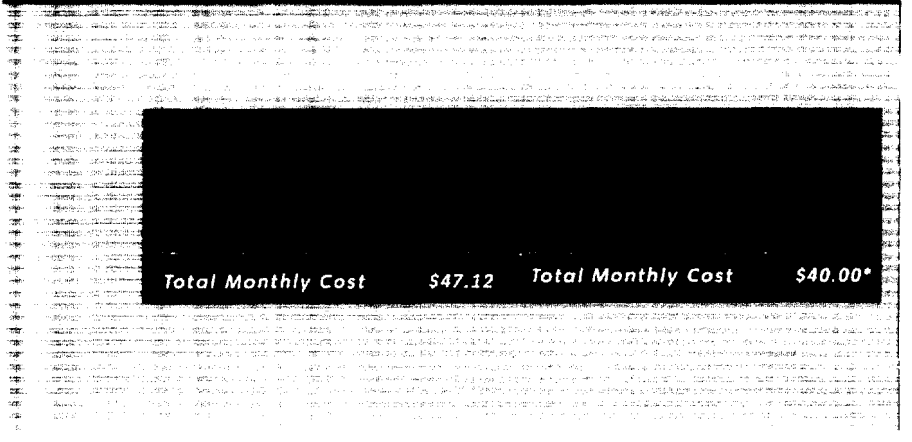
Now experience the

Thanks to DSL technology, BellSouth® FastAccess® Internet service runs in the here and now, just like your work and family. Unleash the full potential of the Internet. The possibilities are endless.

Here's what you get:

- Downloads up to 50 times faster than standard modems.***
- Talk and surf on the same line, at the same time—virtually eliminating the need for a second phone line.
- Quick access to the Internet – no waiting to dial up.
- A point-to-point connection from your computer to our central office means enhanced security and more consistent connection speed, compared to cable modems.
- Your FastAccess connection includes BellSouth® Internet service with Instant Messaging, five e-mail boxes and 10MB of personal Web space for one low monthly rate.
- If your service is ever down, BellSouth provides a back-up dial-up account.
- **Now $40** a month for BellSouth® Solutions customers.*

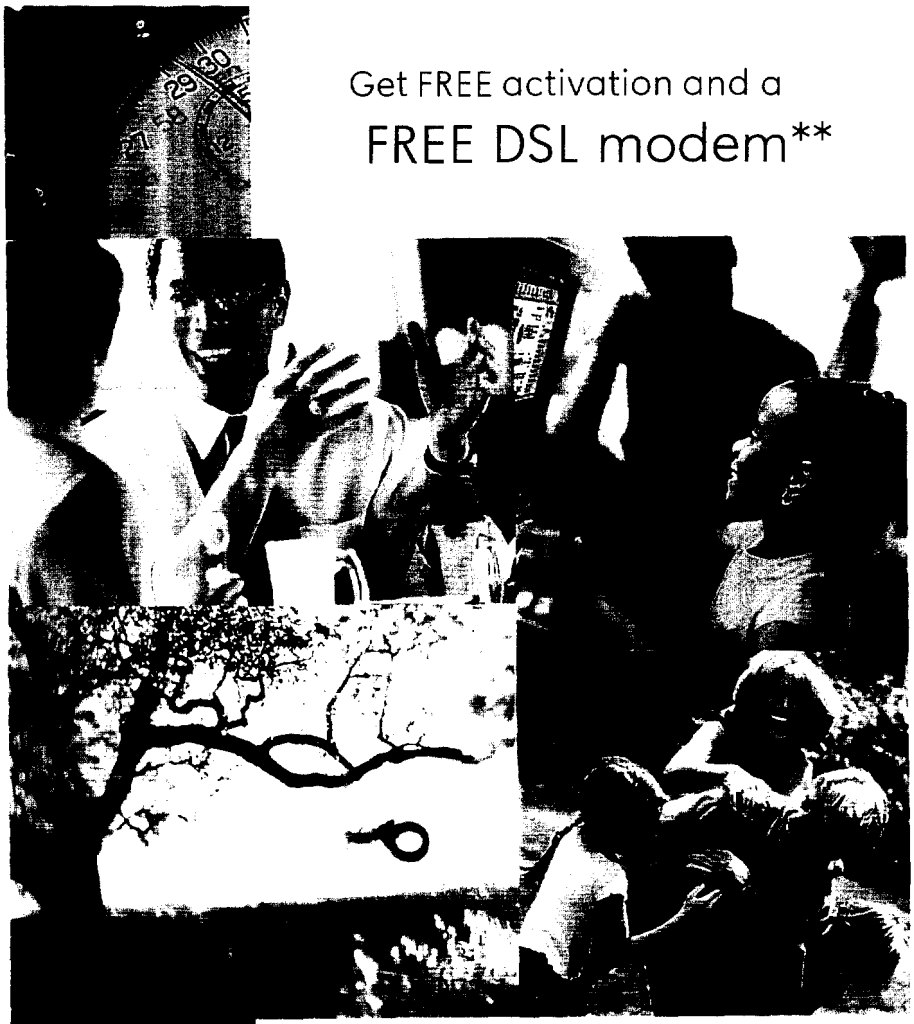
A special bonus for BellSouth FastAccess customers. Once your FastAccess service is installed, you'll have an opportunity to fill out a special travel profile with **LastMinuteTravel.com** and start receiving notification of travel bargains before they're available to the general public! It's our way of saying thank you for being a FastAccess customer.



2 months for the price

and a FREE DSL modem**

> faster downloads >>> connect >>



Get FREE activation and a

FREE DSL modem**

$40

Learn more or order online at

Today

BellSouth® has teamed up
with Alcatel®—
The global leader in DSL Technology.

ALCATEL

ARCHITECTS OF AN INTERNET WORLD

: of 1

and create something BELLSOUTH

ATTACHMENT 2

BellSouth® FastAccess® Internet Service uses DSL technology to run in the here and now, just like your work and family.

Here's what you get:

- Downloads up to 50 times faster than standard modems.*
- Talk and surf on the same line at the same time. There's no need for a second phone line.
- Quick access to the Internet—no waiting to dial up.
- Point-to-point connection from your computer to our central office means enhanced security and more consistent connection speed, compared to cable modems.
- Includes BellSouth® Internet Service with Instant Messaging, five e-mail boxes and 10MB of personal Web space for one low monthly rate. You can save over $7 a month.
- If your service is ever down, BellSouth provides a back-up dial-up account.
- A special travel profile from LastMinuteTravel.com which will notify you of travel bargains before they are available to the public. LastMinute

New low price of $40 per month**

BellSouth® has teamed up with Alcatel®—
The global leader in DSL Technology.

ALCATEL
ARCHITECTS OF AN INTERNET WORLD

Don't wait—order now and get 2 months for the price of 1 and a FREE DSL modem†

Learn more or order online at

† Modem is free with minimum 60 day service period (otherwise modem cost $[illegible] first full month and prorated partial month (if any) will be billed initially, the second full month is free (additional charges for optional features or premium services, if any, will still apply during the free months). Activation and standard installation fees are waived for customers who meet wiring and PC requirements and install the modem themselves (otherwise professional install fees may apply). BellSouth® FastAccess® Internet service is not available in all areas, and prequalification does not guarantee service availability at installation location. Pricing plans include BellSouth's charges and the Global Service Provider's charges for connection to the global Internet. Offer good for residential customers only, and expires 12/31/0[illegible]. [illegible]vice agreement terms and conditions and other restrictions apply; see www.fastaccess.com for details.

* Downloads up to 50 times faster than 28.8K modems. Download speeds may vary.

** Price for BellSouth® Solutions customers; BellSouth® Complete Choice® plan or BellSouth® Area Plus℠ service (each sold separately) is required to qualify for BellSouth® Solutions. Monthly price without BellS[illegible]® Solutions [illegible]5

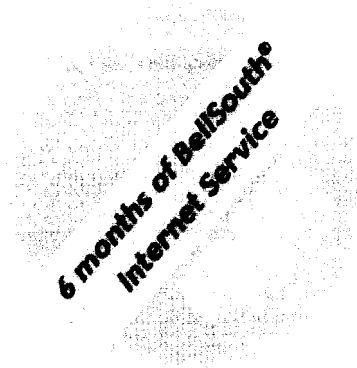
P.O. Box 55288
Atlanta, GA 30308-5288

PRSRT STD
U.S. POSTAGE
PAID
BELLSOUTH

> faster downloads >>

>>> connect >> and create something℠

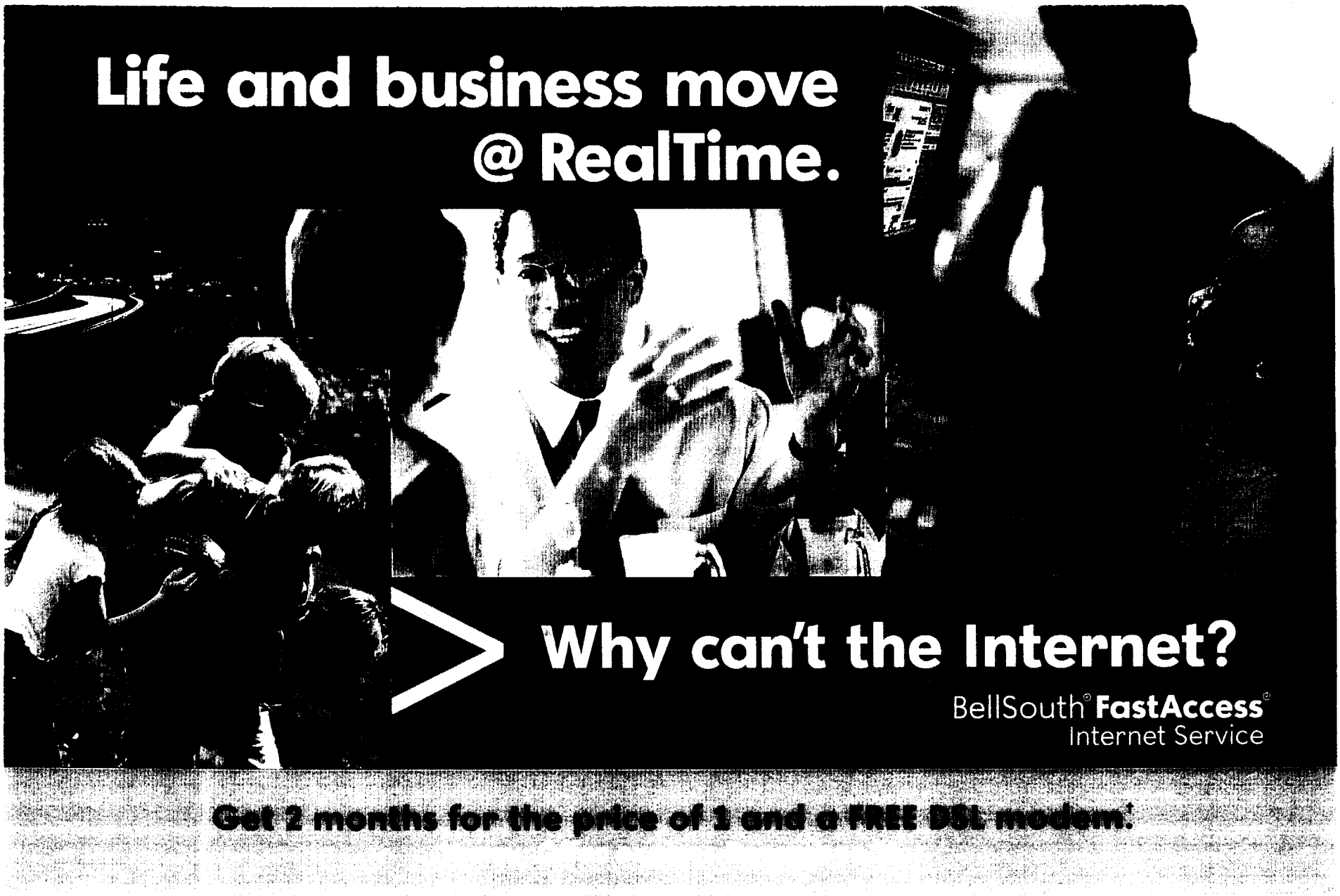
BELLSOUTH®



*******AUTO**5-DIGIT 29681
David Seibold
[redacted]

4PM3

Seibold Attachment 2
Page 1


Life and business move
@ RealTime.
Why can't the Internet?
BellSouth® FastAccess®
Internet Service
Get 2 months for the price of 1 and a FREE DSL modem†

High-Speed Cable Internet Access

Brought To You By Charter Communications

Say "Goodbye" to high speed sticker shock, and "Hello" to from speed fun. With Charter Pipeline™ you can finally enjoy high-speed cable internet access for the price of dial-up. With the speed, ease of use and simplicity that your old-fashioned dial up modem will never touch. Hang-up the phone on dial-up. And pick up the pace with Charter Pipeline today.

CALL NOW FOR

FREE INSTALLATION

(a $99.95 value!)

- **First month of service free!**
- Get Charter Pipeline High-Speed Cable Internet Access for just $24.95* per month
- Monthly cable modem rental only $5 per month.
- AOL Members you can keep your AOL account and speed up your service, too.

What Are You Waiting For?™

Call 1-800-211-4450 Today!

*Available only in Charter Communications-serviceable areas. Price does not include taxes or franchise fees or cable access in non-customer's. Offer applies to new subscribers only. Other restrictions apply. Offer ends soon. ©2001 Charter Communications, Inc. ®Trademarks are the property of their respective owners. All rights reserved.

P A2057 E P

Charter COMMUNICATIONS
A Wireless World Company

PRSRT STD
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PAID
ST LOUIS MO
PERMIT NO 4376

**********AUTO**3-DIGIT 631

[redacted]

T 10 P 1

Whoosh!

Download Everything Unbelievably Faster Than Dial-Up.

Wheeee!

Reclaim Your Phone Line And Forget About Busy Signals.

Wowza!

Unlimited Access To The Internet, Anytime, All The Time.

$24.95

This Changes Everything!

Charter Pipeline™

Charter

EarthLink

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In The Matter of Inquiry Concerning High-Speed Access to the Internet Over Cable and Other Facilities	GN Docket No. 00-185

To: The Commission

DECLARATION OF DON LOHEIDE

I, Don Loheide, declare as follows:

1. I am the Director-Engineering/Technology for Charter Communications, Inc. I have been employed in that position for approximately 1 year. Prior to taking my present position, I was employed by Charter for approximately 4 years as a Staff Engineer and then Engineering Manager. As part of my job, I have been responsible for investigating the technical aspects of configuring Charter's networks to provide access to the Internet, and the technical issues raised by potentially providing access to multiple ISPs.

2. When cable modem service was introduced, it used destination routing. Under destination routing, a packet of data is addressed with its destination, routed across any available backbone, and reassembled at the destination, regardless of the path taken. Destination routing supports full and open access to any web site, but does not support access by multiple ISPs via a cable system. This is because the routers will send the upstream packets to the URL requested by the most efficient route, and the downstream pages will default to the cable CMTS to which the IP address has been assigned.

3. We have investigated four technical "solutions" that would provide a choice of ISP over a cable system.

4. The first option is "source based routing." This is the mechanism implemented by CISCO in order to meet the Canadian CRTC testing requirements. Source based routing is also sometimes referred to as "policy" routing because it requires that policy tables be established in the router for each IP address block.

5. Source based routing examines additional information for each packet of data, so that each router knows not merely where the packet is supposed to go, but who sent it. By examining the source IP address, each router can chose the path designated by the source of the packet instead of just the destination address.

6. Source based routing works only if each router along the path is programmed with tables that can associate the source address with the desired path.

7. A significant problem with source based routing is that in a multiple ISP environment, the system suffers significant deterioration in performance. I am aware that when 8 to 10 ISPs were tested, the system suffered a 25-30% deterioration in performance. Adding more ISPs to the equation would cause even greater deterioration.

8. The second option is "tunneling." Tunneling creates a virtual dedicated channel within the data stream through which an ISP can connect directly to the customer. It does this by insulating the packetized data between the ISP and the customer so that the ordinary routing function of the cable network will not direct that packet of data in any other way.

9. There are two ongoing trade-offs of tunneling, over and above any front-end costs of equipment. First, tunneling causes a major loss of functionalities of cable modem service. DOCSIS 1.0 delivered service at one speed without prioritizing among packets or differentiating

between time sensitive packets and those that could wait. DOCSIS 1.1, however, offers "Quality of Service" capability to prioritize packets and customize speeds, which in turn allows it to deliver IP telephony service without latency, and support video streams. Tunneling, however, makes the packets inside the tunnel invisible to DOCSIS 1.1, thus eliminating its functionalities.

10. The second ongoing cost is in network bandwidth management. Charter designed its cable systems on assumptions regarding how many homes subscribe to cable, how many customers are on line, and how much simultaneous use there is. If we built them to accommodate 100% usage 100% of the time, far greater resources would have to be devoted to smaller nodes, larger bandwidth, and more costly networks.

11. With tunneling, each "virtual" channel would need to implement its own over-subscription model, locking in enough capacity to accommodate each ISP's peak load, which would cause the cable network to lose the efficiencies of its own over-subscription model. The upshot is that far more frequency would have to be set aside by Charter for Internet than is required in optimal network design.

12. The third option, and in Charter's view the current best candidate, is "tag switching" or Multiple Protocol Label Switching ("MPLS"). In tag switching, a data packet is assigned a "tag" at the edge device (*e.g.*, the CMTS), that directs every subsequent router to direct that packet in the customer-selected manner. This significantly reduces the inefficiencies associated with source routing – namely of having each router look up tables to match source routing codes with preferred routes.

13. At present, CISCO equipment supports tag switching, but does not interact well with components from other manufacturers of Internet components, such as a Juniper M40. Adequate mediation devices and standards have yet to be created. We believe that this technology is the

leading candidate for supporting choices of ISPs over cable, but the approach is likely one to one and a half years from being fully ready for the market.

14. A forth option is really a non-option. One can design and build a parallel network within a cable system: a separate CMTS, a separate 6 MHz downstream channel, and a separate 3.2 MHz upstream channel. But the design and performance costs aresubstantial. Downstream channel capacity is consumed unnecessarily. Upstream capacity is in even shorter supply because it is allocated for PPV ordering, interactive service, Internet, and telephony. Theoretically one could take upstream capacity from elsewhere on the spectrum than the 20-42MHz band with which cable modems now interact, but that would require changing out the cable modems and system amplifiers. There are also performance delays as the modems search for the "right" CMTS.

I swear that the foregoing is true and correct to the best of my knowledge.

Don Loheide

November 30, 2000

loheide declaration with Don's edits

CERTIFICATE OF SERVICE

I, Glendora Williams, hereby certify that I have this 1st day of December, 2000, caused a copy of the foregoing to be delivered by courier to the following:

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-B204F
Washington, DC 20554

William Kennard, Chairman
Federal Communications Commission
445 12th Street, SW, Room 8-B201
Washington, DC 20554

Susan Ness, Commissioner
Federal Communications Commission
445 12th Street, SW, Room 8-B115
Washington, DC 20554

Harold Furchtgott-Roth, Commissioner
Federal Communications Commission
445 12th Street, SW, Room 8-A302
Washington, DC 20554

Michael Powell, Commissioner
Federal Communications Commission
445 12th Street, SW, Room 8-A204
Washington, DC 20554

Gloria Tristani, Commissioner
Federal Communications Commission
445 12th Street, SW, Room 8-C302
Washington, DC 20554

Johanna Mikes
Federal Communications Commission
445 12th Street, SW, Room 5-C163
Washington, D.C. 20554

Christopher Libertelli
Federal Communications Commission
445 12th Street, SW, Room 5-C264
Washington, D.C. 20554

Carl Kandutsch
Federal Communications Commission
445 12th Street, SW, Room 3-A832
Washington, D.C. 20554

Douglas Sicker
Federal Communications Commission
445 12th Street, SW, Room 7-A325
Washington, D.C. 20554

Robert Cannon
Federal Communications Commission
445 12th Street, SW, Room 7-B410
Washington, D.C. 20554

International Transcription Services, Inc.
445-12th Street, SW
Room CY-B402
Washington, D.C. 20554

Glendora Williams